

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

UNITED STATES OF AMERICA

vs.

JOHN TOWERY
DUWONE ALLEN

CR. NO. 8:20-cr-452-DCC

18 U.S.C. § 371

18 U.S.C. § 1594(c)

INFORMATION

THE US ATTORNEY CHARGES:

1. That beginning at a date unknown to the Grand Jury, but from at least in or about 2019 to April 2020, in the District of South Carolina, the Defendants, **JOHN TOWERY and DUWONE ALLEN**, and others both known and unknown to the Grand Jury, knowingly and willfully did conspire, combine, confederate, and agree with each other to commit offenses against the United States, including: conspiracy to commit sex trafficking of a minor in violation of Title 18, United States Code, Section 1594(c).

MANNER AND MEANS


2. It was part of the conspiracy that the conspirators would recruit, entice, harbor, transport, provide, obtain, advertise, solicit, patronize, and maintain by any means, a person, and to benefit financially by receiving anything of value from participation in a venture that had recruited, enticed, harbored, transported, provided, obtained, advertised, patronized, solicited, and maintained a person, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe the person, that such person had not attained the age of 18 years and would be caused to engage in a commercial sex act.

OVERT ACTS

3. In furtherance of the conspiracy and to achieve the objects thereof, the Defendants, **JOHN TOWERY and DUWONE ALLEN**, and others known and unknown to the Grand Jury, committed and caused to be committed, in the District of South Carolina, the following overt acts, among others:

- A. It was further part of the conspiracy that the conspirators would transport minor victim one to hotels in the upstate of South Carolina to engage in commercial sex acts.
- B. Defendant **JOHN TOWERY** would engage in sex acts with minor victim one.
- C. Defendant **DUWONE ALLEN** would engage in sex acts with minor victim one.
- D. It was further part of the conspiracy that the conspirators would and did use vehicles, public highways, hotels, telephones, and the internet to facilitate the commercial sex acts.
- E. It was further part of the conspiracy that one or more of the conspirators would take pictures of and videos of minor victim one in sexual activity.

All in violation of Title 18, United States Code, Section 371.


M. RHETT DEHART (CFS/DD)
Acting United States Attorney